

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: James C. Jacobs		
	Debtor(s)	CHAPTER 13
US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust		
	Movant	NO. 22-11836 ELF
vs.		
James C. Jacobs		
	Debtor(s)	
Kenneth E. West		11 U.S.C. Section 362
	Trustee	

**MOTION OF US Bank Trust National Association, Not In Its Individual Capacity But Solely
As Owner Trustee For VRMTG Asset Trust
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust .

2. Debtor(s) is/are the owner(s) of the premises 3025 Comly Road, Philadelphia, PA 19154, hereinafter referred to as the mortgaged premises.

3. Movant is the holder of a mortgage, original principal amount of \$80,846.00 on the mortgaged premises that was executed on March 28, 2008. The mortgage has been assigned as follows:

Specialized Loan Servicing LLC to US Bank Trust National Association, Not in Its Individual Capacity But Solely as Owner Trustee for VRMTG Asset Trust recorded on June 11, 2020 at Document ID Number 53676621

4. Kenneth E. West, is the Trustee appointed by the Court.

5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).

6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$924.86 for the months of August 2022 through October 2022 plus late charges if applicable.

7. The total amount necessary to reinstate the loan post-petition is \$2,774.58.

8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Denise Carlon, Esq.

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